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September 20, 2021

VIA ECF

Hon. John G. Koeltl Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

Stevez v. St. Joseph's College, Civil Action No.: 1:21-cv-06222-JGK

Dear Judge Koeltl:

This firm represents Defendant St. Joseph's College ("Defendant") in the above-referenced action. We have conferred with Plaintiff's counsel and write, with Plaintiff's consent, to request a 30-day extension of Defendant's responsive pleading deadline. This is the first request for an extension of this deadline.

By way of background, Defendant waived service of the Summons and Complaint on July 23, 2021, and its responsive pleading is accordingly due on September 21, 2021. (ECF No. 6.) The Initial Pretrial Conference is presently scheduled for November 3, 2021. (ECF No. 10.)

The parties are engaged in settlement discussions, and Defendant would like to focus its attention and resources on those discussions rather than litigation activities that may be unnecessary. Accordingly, Defendant respectfully requests that the responsive pleading deadline be extended by 30 days, up to and including October 21, 2021. This extension, if granted, will not affect any other scheduled dates.

This application is being made in good faith and not to cause undue delay. We thank the Court for its time and attention to this matter, and for its consideration of this application.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)